

 **COPY**

PETER S. MARYOTT
August 8, 2006

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1 UNITED STATES DISTRICT COURT FOR
2 THE DISTRICT OF MASSACHUSETTS
3 CIVIL ACTION NO.: 04-12244-GAO
4 Consolidated

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5 * * * * *

6 STANDARD FIRE INSURANCE COMPANY,

7 Plaintiff,

8 vs.

9 OYSTER YACHT YARD, INC. and

10 OYSTER HARBORS MARINE, INC.,

11 Defendants.

12 * * * * *

13
14 DEPOSITION OF: PETER S. MARYOTT

15
16 MASI & BRUNO

17 124 Long Pond Road

18 Plymouth, Massachusetts 02360

19
20 August 8, 2006 2:10 p.m. - 4:28 p.m.

21
22
23 KATHRYN K. GIANNO

24 COURT REPORTER

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1 for you today, as may the other attorneys.

2 I'll ask you a question and then I
3 would ask that you respond to the question verbally;
4 if you shake your head, grunt, groan, waive your
5 hands, anything such as that can't be accurately
6 recorded. If you don't understand a question I've
7 asked, feel free to let me know and I'll try to
8 repeat or rephrase the question.

9 If at any time you need to take a
10 break for any reason or to speak with your attorney,
11 let me know and I'll try to accommodate that request
12 as well. Do you understand those instructions?

13 A. Yes.

14 Q. What is your full name?

15 A. Peter Maryott.

16 Q. And could you spell Maryott?

17 A. M-A-R-Y-O-T-T.

18 Q. What is your residential address?

19 A. 138 King James Drive, East Dennis, Mass.
20 02641.

21 Q. How long have you lived at that address?

22 A. Twenty-five years.

23 Q. Do you have any immediate plans to move
24 from that address?

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1 A. No. Please add Post Office Box 508, if
2 you're sending me something.

3 Q. Are you presently employed?

4 A. Yes, Oyster Harbors Marine.

5 Q. What is your position there?

6 A. Vice President and General Manager.

7 Q. How long have you been Vice President and
8 General Manager of Oyster Harbors Marine?

9 A. Since 1989.

10 Q. Are you here today representing Oyster
11 Harbors Marine?

12 A. Yes.

13 Q. Have you had an opportunity to review the
14 Notice of Deposition that's issued in this matter?

15 A. Yes.

16 Q. I'll show you a copy of a document. If
17 you would take a few moments to look at that,
18 please?

19 A. Yes.

20 Q. Do you recognize that document?

21 A. Yes.

22 Q. Is that the Notice of Deposition for
23 Oyster Harbors Marine?

24 A. Yes.

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1 Q. Have you been designated to appear today
2 to testify on behalf of Oyster Harbors with regard
3 to the matters that are set forth on pages two or
4 three of that notice?

5 A. Yes.

6 Q. Turning to Item Number One, on Page Two,
7 "Knowledge of cause and origin of the fire which
8 occurred at Oyster Harbors Marine on December 10,
9 2003," what information do you have with you today
10 with regard to what the cause and origin of the
11 December 10, 2003 fire was?

12 A. I know only what the fire department
13 provided for information.

14 Q. And to your knowledge, does Oyster Harbors
15 Marine have any additional information other than
16 what the fire department provided?

17 A. No.

18 Q. What information did the fire department
19 provide to Oyster Harbors Marine regarding the
20 December 10 2003 fire?

21 A. We received a copy of the report, which I
22 believe we submitted to you, to John Bruno.

23 Q. And other than the fire department report,
24 did the fire department provide any additional

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1 property on the premises of Oyster on December 10,
2 2003?

3 A. We have a storage contract with the people
4 --

5 MR. BRUNO II: He just asked you if you
6 have information. Yes or no.

7 A. No. Ask the question again, please.

8 Q. Yes. Do you have information today as to
9 the practices, procedures and methods of storing
10 boats and personal property on the premises of
11 Oyster on December 10, 2003?

12 A. Yes.

13 Q. What were the practices, procedures and
14 methods of storing boats and personal property at
15 Oyster Harbors Marine on December 10, 2003?

16 A. I'm not sure, are you asking me to go
17 through the procedures that we do to store these
18 boats? We have a storages contract that tells what
19 the requirements are of Oyster Harbors Marine and
20 what the requirements are of the customer, and you
21 have a copy of that.

22 Are you asking me to explain to you
23 how we take a boat out of the water?

24 Q. Essentially, yes. If I come to you, I